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**From:** Williams, Jonathan R. [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=E099C65734B44D97BBB040607C615812-WILLIAMS, J]  
**Sent:** 8/15/2018 10:07:47 PM  
**To:** Ross, Philip [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=55d4ef460ed745bdaa975213087b0683-PROSS]; Giles-Parker, Cynthia [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=73095906893642468fa7af996da3cf58-Cynthia L. Giles-Parker]; Johnson, Hope [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=3b0950574252454393a8915c2f21a711-Hope Johnson]; Muhammad, Maryam K. [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=2f51c5e21e2443a7bdb8587d1f0c5f2c-Muhammad, M]; Costello, Kevin [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=a75e8c935c7e4f439f5a26b54ca0caf8-Kevin John Costello]; Zinn, Nicole [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=ebb6c3c9f28c4542a826017575fcf442-Nicole Y Zinn]  
**CC:** Goodis, Michael [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=50ed0b92dc4945b7a808fe8dbc9224f0-Michael Goodis]; Smith, Charles [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=74d894a08f0b4d079b1632049bc5ebf4-Charles William Smith]  
**Subject:** RE: Information Requested About Tebuconazole GDCI  
**Attachments:** Tebuconazole Final Work Plan.pdf; Tebuconazole DCI 9.13.17.PDF; Timeline of Tasks.one; Bayer 90-Days Response Cover Letter.pdf; Helm 90-Days Response.pdf; Tide 90-Days Response.pdf; United Phos 90-Days Response.pdf; Jiangsu 90-Days Response.pdf; Luxembourg 90-Days Response.pdf; Willowood 90-Days Response.pdf; Bayer 90-Days Response 23 Dec 17.pdf; Sharda 90-Days Response.pdf; Rotam 90-Days Response.pdf; Updated Tebuconazole Cost Sharing 15 Aug 18.xlsx; 20180814 Tebuconazole TF EPA meeting.pptx

Good Evening Phil,

Per our phone conversation today and your email below, I have attached the following documents related to Tebuconazole:

- Tebuconazole Final Work Plan, June 2016
- GDCI, as issued, 13 Sept 2017. Recipients (cut and paste from GDCI):
  - LUXEMBOURG-PAMOL, INC.
  - REPAR CORP
  - KOPPERS PERFORMANCE CHEMICALS
  - NEW ZEALAND
  - ROTAM LIMITED
  - UNITED PHOSPHORUS, INC
  - LOVELAND PRODUCTS, INC.
  - SOURCE DYNAMICS, LLC
  - ARCH TREATMENT TECHNOLOGIES, INC.
  - HELM AGRO US, INC.
  - LANXESS CORPORATION
  - SHARDA CROPChem LIMITED
  - NUFARM AMERICAS, INC.
  - TACOMA AG, LLC
  - VIANCE, LLC
  - KOP-COAT, INC.
  - AXSS TECHNICAL HOLDINGS, LLC
  - ADAMA IRVITA N.V.

- KOPPERS PERFORMANCE CHEMICALS, INC.
  - OSMOSE UTILITIES SERVICES, INC.
  - LIBERTY CROP PROTECTION, LLC
  - ARCH WOOD PROTECTION (NZ) LIMITED
  - JIANGSU FENGDENG CROP SCIENCE CO., LTD.
  - ALBAUGH, LLC
  - TIDE INTERNATIONAL, USA, INC.
  - BAYER CROPSOURCE LP
  - ARCH WOOD PROTECTION, INC.
  - NUFARM AMERICAS, INC.
  - WILLOWOOD TEBUCONAZOLE, LLC
- My personal notes: The “Timeline of Tasks” gives details of every action taken on this registration review case since I picked up the case in mid-June; the “Mtg w TF 14 Aug 18” references the meeting with the United Phosphorous Inc cost-sharing consortium (called the Tebuconazole Taskforce, and referred to as the Tide or UPI alliance in my notes); These notes are on One Note, so you’ll get all of my One Notes, because I can’t see how to share just one notebook in One Note. The Tebuconazole TF indicated that they formed in response to Bayer’s (they did not specifically name Bayer) refusal to let all parties in the Bayer consortium have equal access to the data for equal pay. It was somewhat cryptic. The Tebuconazole TF is represented by Janelle Kay of Pyxis Regulatory Consulting (janelle@pyxisrc.com) and Dave Olson of UPI (dave.olson@uniphos.com).
  - An Excel summary of 90-Days Responses: The “Alliances” tab summarizes the cost-sharing consortiums as I understand them; the “Cost Sharing” tab was a method of working out the alliances as best I could—read this chart from left to right (for example, choose Bayer from the left column and then scan across to see if it indicated that it was willing to share with each of the companies listed across the top, then choose another company from the left and scan across to the Bayer column and see if they are in agreement); The “90 Day Responses” summarizes the registrants’ responses to the GDCI (this was made fast; may contain errors)
  - The 90-Days Responses of the companies that you indicated (Bayer, Helm, Tide, UPI, Jiangsu, Luxembourg, Willowood, Sharda, and Rotam): Tide’s response was filed under the Jiangsu folder in our database, but appears to otherwise be in order; both Bayer and the Tebuconazole TF have indicated that they have entered into cost-sharing agreements with Helm (see Bayer 90-Days Response Cover Letter and the presentation by the Taskforce embedder in my personal notes from the meeting and attached). I’m not sure what to make of that and haven’t had time to follow up, as I just learned of this yesterday. For many of the requested 90-Days Responses I am unable to provide the original response, only a re-submission.
  - Finally, my understanding is that both the Bayer consortium and the Tebuconazole Taskforce are working to fulfill the data requirements (excluding antimicrobial requirements—Bayer voluntarily canceled its antimicrobial registrations to avoid the data requirements, while the TF companies claim not to have any such uses). Both parties have expressed the need for more time on some studies, particularly the acute oral toxicity study (GLDN 850.2100), but none of the delays have pushed the data development beyond the latest deadline in the GDCI, as of yet. Please let me know if you would like more information.

If you have any questions regarding these documents, please reach out. I will be out of the office Friday (8/17/18) and Monday (8/20/18). My team lead, Nicole Zinn has been working closely with me on this case, as well. Unless anyone objects, I am happy to act as the point of contact for PRD.

I apologize for not responding to the most-recent message in this email thread. Drafting this message took some hours, and several responses came in during that time. I do not believe that the contents of those responses effects anything presented here.

Best wishes,  
Jon

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**From:** Ross, Philip  
**Sent:** Wednesday, August 15, 2018 2:28 PM  
**To:** Giles-Parker, Cynthia <Giles-Parker.Cynthia@epa.gov>; Johnson, Hope <Johnson.Hope@epa.gov>; Muhammad, Maryam K. <Muhammad.Maryam@epa.gov>; Costello, Kevin <Costello.Kevin@epa.gov>; Zinn, Nicole <Zinn.Nicole@epa.gov>; Williams, Jonathan R. <williams.jonathanr@epa.gov>  
**Cc:** Goodis, Michael <Goodis.Michael@epa.gov>; Smith, Charles <Smith.Charles@epa.gov>  
**Subject:** Information Requested About Tebuconazole GDCI  
**Importance:** High

Attorney Client Communication  
Attorney Work Product  
Deliberative  
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All—

We have recently received some petitions pertaining to requirements imposed by the Tebuconazole GDCI.

I'm doing some initial research into the GDCI and the status of efforts to comply with it.

I'd greatly appreciate if you could supply me with a complete copy of the GDCI, a complete list of registrants who were issued the GDCI, and copies of the 90-day responses for the registrants listed below. Additionally, please let me know the status of efforts to address the data requirements based on submissions already made to the Agency, particularly any data requirements that are currently due or due at the one year mark following GDCI issuance.

The registrants for which I would like to receive the requested information are: Bayer CropScience LP; Tide International USA, Inc.; Rotam CropSciences LTD.; Jiangsu Fengdeng Crop Science Co., LTD; United Phosphorus, Inc.; Willowwood USA, LLC; Sharda Cropchem Ltd.; Luxembourg-Pamol, Inc.; and Helm Agro US, Inc.

I am sending this to people identified by Mike Goodis and Billy Smith as being involved with Tebuconazole in RD and PRD. I'd also appreciate if RD and PRD could each identify a lead person for their division to whom I can primarily direct further questions ,etc. regarding this matter.

Once I have the requested information and principal point of contacts, I will let you know about any additional information needs I might then have and then we can also discuss next steps.

Thank you in advance for your time and assistance. I look forward to hearing from you by Tuesday, August 21<sup>st</sup>.

Phil

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